



# FARM

## Farm Animal Reform Movement

10101 Ashburton Lane, Bethesda MD 20817; 301-530-1737

3772 '01 JAN 16 10:46

January 11, 2001

### OFFICERS

Alex Hershaft, PhD  
President

David V. Pryor  
Program Director

### ADVISORS

Casey Kasem  
Radio and TV Host

Elliot Katz, DVM  
In Defense of Animals

Michael Klaper, MD  
Author, Lecturer

John Kullberg, PhD  
Humane Society of US

Frances M Lappe  
'Diet for Small Planet'

Tony LaRussa, JD  
St. Louis Cardinals

Mary Levy  
Buffalo Bills

Howard Lyman  
Humane Society of US

Jim Mason, JD  
'Animal Factories'

John McDougall, MD  
Author, Lecturer

Doug Moss  
E Magazine

Al Oerter  
Olympic Gold Medalist

Cassandra Peterson  
'Elvira'

Jeremy Rifkin  
'Beyond Beef'

John Robbins  
'Diet for New America'

Peter Singer  
'Animal Liberation'

Zoe Weil  
'Animalearn'

US Food and Drug Administration  
Dockets Management Branch  
5630 Fishers Lane, Room 1061  
Rockville, MD 20852

Re: Docket Number 98P-0151/CP1

To Whom It May Concern:

We ask that the Food and Drug Administration grant the petition to prohibit slaughter of downed animals (Petition 98P-0151/CP1).

Last year, USDA announced its new policy to stop purchasing meat from downed cows for federal programs. USDA's decision marks a growing consensus among government officials and livestock industry that marketing and slaughter of downed animals is unacceptable.

### Marketing Downed Animals Poses a Risk to Human Health

Non-ambulatory animals should not be considered fit for human consumption. Downed animals are diseased or severely stressed due to grievous injuries. The use of such animals in meat production poses an increased health risk to consumers from bacterial contamination and disease.

### Prohibiting Marketing of Downed Animals Will Cause No Economic Hardship

Downed animals make up a small percentage of livestock industry profits. Many industry officials have indicated that the loss of sale of a downed animal is well worth avoiding negative public relations, which could impact overall industry profits. Industry experts also estimate that ninety percent of downed animals can be prevented with better care and handling.

### Marketing Downed Animals is Inhumane

Downed animals are not protected from abuse under federal animal welfare laws and most state anti-cruelty laws. Downed animals are typically moved by the easiest, but least humane ways. They are dragged with chains or pushed with tractors or forklifts---practices that cause injuries ranging from bruises and abrasions to torn ligaments and broken bones. Downed animals frequently are left to die of neglect.

Recycled Paper

98P-0151

"Saving Our Planet - One Bite at a Time"

C 3358

FARM is a national, nonprofit organization representing over 15,000 members in the US. Our mission is to promote humane, sustainable agriculture and expose cruelty to farm animals to the public.

We look forward to FDA's favorable response to the petition to ban marketing and slaughter of downed animals.

Sincerely,

Lucy Goodrum, Esq.

**FARM**

**PO Box 30654, Bethesda, MD 20824**

**ADDRESS SERVICE REQUESTED**

***"Saving Our Planet - One Bite at a Time"***



US Food and Drug Administration  
Dockets Management Branch  
5630 Fishers Lane, Room 1061  
Rockville, MD 20852

20857/0001

